

**THIS OMNIBUS OBJECTION SEEKS TO EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OMNIBUS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULES A THROUGH H ATTACHED TO THE PROPOSED ORDER SUBMITTED HERewith.**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

**FOX ROTHSCHILD LLP**

1301 Atlantic Avenue  
Midtown Building, Suite 400  
Atlantic City, NJ 08401-7212  
Michael J. Viscount, Esq.  
Martha B. Chovanes, Esq.  
Joseph J. DiPasquale, Esq.  
mviscount@foxrothschild.com  
mchovanes@foxrothschild.com  
jdipasquale@foxrothschild.com  
Telephone: (609) 348-4515  
Facsimile: (609) 348-6834

*Counsel to the Liquidating Trust*

In Re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-16520-JNP

Hon. Jerrold N. Poslusny, Jr.

**Hearing Date: January 9, 2024  
Hearing Time: 11:00 a.m. (EST)**

**Objection Deadline: January 2, 2024**

**NOTICE OF THE LIQUIDATING TRUST'S FIRST OMNIBUS OBJECTION FOR  
ENTRY OF AN ORDER EXPUNGING CERTAIN CLAIMS**

**PLEASE TAKE NOTICE** that on January 9, 2024 at 11:00 a.m. (ET), or as soon thereafter as counsel may be heard, the Liquidating Trust of Aluminum Shapes L.L.C. (the "Liquidating Trust"), by and through its undersigned counsel, shall move before the Honorable Jerrold N. Poslusny Jr., United States Bankruptcy Judge for the United States Bankruptcy Court

for the District of New Jersey (the “Bankruptcy Court”), 400 Cooper Street, 4<sup>th</sup> Floor, Courtroom 4C, Camden, NJ 08101, or such other physical or virtual location as may be determined by the Court, for the entry of an order pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 expunging the claims (the “Objection”) set forth on Schedules A through H to the proposed order (the “Proposed Order”) submitted herewith and granting such other relief as is just and proper.

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read these papers carefully and discuss them with your attorney. You should locate your name on Schedules A through H attached to the Proposed Order. Be sure to review each schedule as your name may appear on one or more of the schedules.**

**PLEASE TAKE FURTHER NOTICE** that the Liquidating Trust shall rely upon the accompanying Objection which includes a statement as to why a memorandum of law is not required and the Certification of Robert N. Michaelson submitted in support of the relief requested therein. The Proposed Order is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-2, responsive pleadings, if any, must be filed with the Clerk of the Bankruptcy Court, 401 Market Street, Camden, NJ 08101 and served upon counsel for the Committee: (i) Michael J. Viscount, Esq. (mviscount@foxrothschild.com), 1301 Atlantic Avenue, Suite 400, Midtown Building, Atlantic City, NJ 08401; (ii) Martha B. Chovanes, Esq. (mchovanes@foxrothschild.com), 2000 Market Street, 20<sup>th</sup> Floor, Philadelphia, PA 19103; and (iii) Joseph J. DiPasquale (jdipasquale@foxrothschild.com), 49 Market Street, Morristown, NJ 07960, at least **seven (7) days** prior to the aforesaid hearing date.

**PLEASE TAKE FURTHER NOTICE** that responses must be in writing and should contain, at a minimum, the following: (1) a caption setting forth the name of the Bankruptcy Court,

the Debtor's name and case number (as set forth at the beginning of this notice) and a title indicating that you are responding to the Objection; (2) your name and contact information (including phone number where you may be contacted) or your attorney's name and contact information; (3) the claim number(s), if any, to which your response is directed; and (4) the specific factual basis, supporting legal argument, and any documentation upon which you will rely in responding to the Objection.

**PLEASE TAKE FURTHER NOTICE** that if you file a response to the Objection, you should be prepared to argue that response on the return date of the hearing unless you reach an agreement with counsel to the Liquidating Trust to resolve your claim or continue your matter to a future hearing date.

**PLEASE TAKE FURTHER NOTICE** that unless objections are timely filed, the Objection shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument on the return date of the Objection if objections are timely filed.

**FOX ROTHSCHILD LLP**

*Counsel for the Liquidating Trust of Aluminum Shapes L.L.C.*

By: /s/ Martha B. Chovanes  
Michael J. Viscount, Esq.  
Martha B. Chovanes, Esq.  
Joseph J. DiPasquale, Esq.

Dated: December 5, 2023